

From: Rick G. Acker  
Subject: Regulation Z -- Truth in Lending

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Comments:

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Comments:

I am contacting you in support of making sure that your language in the Dodd-Frank laws regarding "Customary and Reasonable Fees" is not misinterpreted by anyone who may have an interest in keeping the fees paid to the appraisers low for their own benefit. I am sure it was never the intent of the HVCC and now Dodd-Frank bills to let Appraisal Management Companies to take their payment out of the appraisers fees. I have seen several that have interpreted the laws this way. I strongly back the section that tried to address this issue by stating that appraisers are to be paid "customary and reasonable fees" and the AMC's fees are NOT to be used to determine what they are. My expenses are more now than they ever were and the appraisals are more intense than ever. In my estimation appraisal fees are too low for the additional time and work involved to do a creditable analysis nowadays. Thank you for recognizing that AMC's were and are causing problems by paying fees commensurate with fees back in 1997. I, by the way, do not do work for such AMC's. I cannot afford it.